

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

MAY 13 2019

David J. Bradley, Clerk of Court

United States of America)
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)
 V.) Case No.
)
)
Leonardo AGUIRRE-GARZA)
 Defendant(s))

B-19-563-MJ

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/12/2019 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

Code Section
Title 18 USC 1956(h), and Title 31 USC 5332

Offense Description
Conspiracy/ Laundering of Monetary instruments in violation of Title 18, USC 1956 (h) and Bulk Cash Smuggling into or out of the United States in violation of Title 31, USC 5332

This criminal complaint is based on these facts:

On May 12, 2019, Cameron County Sheriff's Office (CCSO) conducted a traffic stop on a 2007 Silver Jeep Commander for a traffic violation. The vehicle, bearing a temporary "in transit" auction tag was being driven and solely occupied by an individual identified as Leonardo GARZA Aguirre. After an initial encounter and nervous demeanor CCSO Deputies obtained verbal and written consent to search the vehicle. A subsequent search and K9 alert, revealed a total of thirty five (35) individual vacuum sealed bundles of bulk cash (U.S currency more than \$10,000 USD) concealed within a spare tire attached underneath the vehicle.

On the listed date Leonardo GARZA Aguirre, post Miranda, admitted to knowingly and willingly conspiring with persons known and unknown to facilitate the transportation of monetary instruments, which he believed was derived from illegal activity. GARZA Aguirre admitted transporting the monetary instruments from Greensboro, North Carolina to Brownsville, Texas for its subsequent smuggling into Mexico.



Continued on the attached sheet.



Complainant's Signature

Jason Broughton Special Agent

Printed name and title



Judge's signature

Ignacio Torteya III U.S. Magistrate Judge

Printed name and title

Brownsville, Texas

City and State

5-13-2019

Date